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January 22, 2015

**VIA ECF**

Hon. George B. Daniels  
United States District Judge  
United States District Court for the Southern District of New York  
500 Pearl Street  
New York, NY 10007-1312

Re: *Sokolow v. Palestine Liberation Organization et al.*, 04-CV-397 (GBD) (RLE)

Dear Judge Daniels,

Plaintiffs have indicated that Drs. Rael Strous and Tuvia Perry are among the next group of witnesses they intend to call in their case at trial. Exh. 1. Dr. Strous should not be permitted to testify about the non-economic damages allegedly suffered by Shaul or Nurit Mandelkorn. Dr. Perry should not be permitted to testify at all.

**Dr. Strous.** Dr. Strous conducted mental health examinations of, *inter alia*, Shaul Mandelkorn and Nurit Mandelkorn. The Court has dismissed those Plaintiffs from the case. DE 646 at 23 n.22 (November 19, 2014 Order on Defendants' motion for summary judgment). As a result, Dr. Strous should not be permitted to testify as to the non-economic damages alleged suffered by those individuals.

**Dr. Perry.** According to the Plaintiffs' interrogatory responses, Dr. Perry has knowledge that Shaul Mandelkorn "'suffered severe physical, emotional, mental and economic harm and injuries as a direct and proximate result' of the June 19, 2002 Bombing." *See* Exh. 2 at 2 (Third Supplemental Answer). Again, the Court dismissed Shaul Mandelkorn as a Plaintiff as part of its November 19, 2014 Order on Defendants' motion for summary judgment. DE 646 at 23 n.22. As a result, there is no need for Dr. Perry's testimony, and his testimony should be excluded in full.

Sincerely,

A handwritten signature in blue ink, appearing to read "BHill", written over a light blue circular stamp.

Brian A. Hill

cc: All ECF Counsel